

### Setting the stage.....

- Does the defendant help watch your child(ren)?
- Do you rely on this help?
- Can you afford to pay someone else to watch your child(ren)?
- Without daycare could you continue to work?

---

---

---

---

---

---

---

### Setting the stage.....

- Does the defendant help around the house in other ways?
- Fixes things (mower, tv, washer)
- Mows the grass
- Kills spiders!
- Takes the kids to lessons on Wednesdays

---

---

---

---

---

---

---

### Setting the stage.....

- Are you financially dependant on the defendant?
- Are you dependent on his help at home?
- Do you want him to get into trouble in this case?

---

---

---

---

---

---

---

### QUESTIONING VICTIMS ABOUT THE CRIME(S) CHARGED

- I'd like to take you to (date of offense).
- Was that day a (day of the week)?
- Did you work? (picture of outside of work) If so, how many hours at the job you've told us about?
- When you got off work, how did you get home? Is this the car you've told us about? (picture of car)

---

---

---

---

---

---

---

---

### Questions about the offense....

- Who was there when you got home? (picture of family members including children)
- Where was (each person)? (pictures of room in house)
- Use pictures, diagram and objects to make the descriptions real to the jury

---

---

---

---

---

---

---

---

### Questions about the offense....

- Does your kitchen have knives? (picture)
- What do you use them for?
- Where are they kept? (picture)
- At approximately (time) were the police called to your house?

---

---

---

---

---

---

---

---

### Questions about the offense....

- Who called them? (911 | tape if victim called)
- Did they come to your house?
- How many police officers responded to the call for them?
- Were they in uniform?

---

---

---

---

---

---

---

---

### Questions about the offense....

- Did any of them ask you questions?
- Where were you when you talked to the police? (picture)
- Why did you think they were questioning you?
  - they wanted to know what happened or why they were called

---

---

---

---

---

---

---

---

### Questions about the offense....

- What did happen or why were they called?
- \*\*\*GET READY TO IMPEACH\*\*\*  
ARIZONA RULE OF EVIDENCE 607  
"Any party, including the party that called the witness, may attack the witness' credibility."
- When you spoke to the officers you knew they were trying to find out what happened.
- And you understood the importance of telling them everything that happened.

---

---

---

---

---

---

---

---

### Impeaching.....

- Do you remember telling the police :

You were in the kitchen  
 The defendant came into the same room  
 The defendant was upset/mad  
 You two argued/defendant yelled  
 You were afraid/you backed away/you left the room  
 The defendant accused you of .....

---

---

---

---

---

---

---

---

### Impeaching....

You told the defendant you were not .....  
 The defendant said he did not believe you  
 The argument continued  
 The defendant pushed / slapped / punched/stabbed/ shot you  
 Your child(ren) said they saw this/were crying  
 You tried to get away from the defendant  
 You couldn't/were able to....

---

---

---

---

---

---

---

---

### Impeaching....

- After the police officer(s) talked to you, do you remember them asking you to write a voluntary statement?

**LAW ENFORCEMENT TRAINING COMES IN HERE!**

- Is this your handwriting?
- Is this your signature at the bottom?  
**ADMIT STATEMENT**

---

---

---

---

---

---

---

---

### Save for closing....

NOTE: VICTIM MAY CLAIM SHE WAS  
DRUNK / OFF HER MEDS / MAD / MADE IT UP

YOU HANDLE THESE CLAIMS BY ADDRESSING  
THEM IN CLOSING

DRUNK - LOOK AT HER HANDWRITING  
LEGIBLE

---

---

---

---

---

---

---

### Save for closing....

OFF HER MEDS - LOOK AT DETAILS OF HER  
STATEMENT - THINKING, DETAILS

MAD & MADE IT UP - UNIFORMED POLICE  
OFFICERS THERE, KNEW LIKELY HE'D BE  
ARRESTED, NOT MAD ENOUGH TO TAKE  
MONEY, CHILD CARE, HELP AROUND THE  
HOUSE AWAY UNLESS HE COMMITTED  
THIS CRIME. SHE WAS AFRAID OF HIM

---

---

---

---

---

---

---

### Impeaching....

Do you remember going to the police station  
talking to the law enforcement officer in front  
of their police car?

That conversation was videotaped wasn't it?

TRAINING LAW ENFORCEMENT OFFICERS  
SO IMPORTANT

---

---

---

---

---

---

---

### Impeaching....

- Have you watched this DVD?
- Did it accurately record your conversation?  
(may need to lay foundation with the police officer for admission)

ADMIT VIDEO

PLAY VIDEO TO JURY

---

---

---

---

---

---

---

---

### Impeaching....

- Do you remember seeing a police officer collecting (bat, knife, etc.)?
- Did you ever try to stop them from taking it?

SAVE FOR CLOSING: THE IMPORTANCE OF THE VICTIM "ALLOWING" EVIDENCE COLLECTION

---

---

---

---

---

---

---

---

### Proving the offense....

- Was the defendant arrested that day?  
If not, where did she spend the night?

DON'T FORGET TO CALL THESE PEOPLE RELATIVES/FRIENDS TO TESTIFY TOO

If yes, what did she do that night?

- Cleaned up the blood
- Spent it with her child(ren)
- Went to bed early
- Even watched TV (shows at peace with defendant locked up)

---

---

---

---

---

---

---

---



## DON'T FORGET...

### GOLD MINES

- Get recorded calls from jail
- To check to see who put money on the defendant's books
- Who visited the defendant in jail
- If you can, get the letters/cards the defendant sent to the victim

---

---

---

---

---

---

---

## ENDING THE DIRECT EXAM

### FOCUS ON FOLLOW THROUGH

- Did she get a PFA?  
If so, get the file, even if later dismissed
- Did she move out - even temporarily?
- Who else did she tell about this - friends, family, co-workers?
- Did she miss work because of this?

---

---

---

---

---

---

---

## Focus on follow through....

- Did she go to counseling/get her kids into counseling?  
call the therapist to testify
- Did she miss regular events because she had bruising (kids' games, bowling)
- get the hospital/ambulance/fire records

---

---

---

---

---

---

---

PROBLEM WITNESSES IN  
SEXUAL ASSAULT CASES

VICTIMS

---

---

---

---

---

---

---

THIS PROBLEM MAY BE VERY  
DIFFERENT FROM  
RECATANTATION/MINIMIZATION  
PROBLEMS IN OTHER CASES

---

---

---

---

---

---

---

» RELUCTANT VICTIMS OF SEXUAL  
ATTACK SUFFER FROM:

- GUILT, BLAME
- SHAME, HUMILIATION
- MINIMIZATION
- NOT WANTING TO "RELIVE" THE CRIME

---

---

---

---

---

---

---



IMPORTANCE HERE LAYS NOT  
WITH IMPEACHMENT, BUT IN  
"EXTRACTING" THE DETAILS SHE  
MAY NOT WANT TO GIVE

---

---

---

---

---

---

---

PRETRIAL  
PREPARATION  
IS  
A  
MUST!

---

---

---

---

---

---

---

### GET THE EASY THINGS FIRST...

- Things that she will not mind talking about
  - Her job (maybe her new job)
  - Her education (or school she is attending)
  - Her career goal - what she wants to do
  - Clubs she belongs to
  - Friends she has - if they will testify later
  - Her children
  - Her pets
  - Where she volunteers

---

---

---

---

---

---

---

### Get the easy things first....

- THIS IS QUESTIONING THAT SIMPLY INTRODUCES YOUR VICTIM TO THE JURY
- JUDGES VARY ON THEIR PATIENCE WITH THIS LINE OF QUESTIONING

---

---

---

---

---

---

---

---

### Get the easy things first....

- GET THE DETAILS OF HER BACKGROUND
  - WHERE SHE LIVES
    - (PICTURES OF HOME, IF ATTACK OCCURRED IN HER HOME)
  - HOW LONG SHE HAS LIVED THERE
  - WHETHER SHE RENTS OR OWNS

---

---

---

---

---

---

---

---

### Get the easy things first....

- WHAT SHE DRIVES
- WHEN SHE GOT IT
- DESCRIBE THE INTERIOR
- (PICTURES OF VEHICLE IF ATTACK OCCURRED IN HER VEHICLE)

---

---

---

---

---

---

---

---

### Get the easy things first...

- WHETHER SHE KNOWS THE DEFENDANT

LIKELY SHE WILL  
HOW LONG SHE'S KNOWN HIM  
HOW OFTEN SHE SAW HIM  
WHERE SHE WOULD SEE HIM

---

---

---

---

---

---

---

### BE CAREFUL NOT TO OPEN THE DOOR TO RAPE SHIELD EVIDENCE!

- Arizona Statute: 13-1421
- EVER DATE
- IN MOST CASES, DON'T GO THERE!

---

---

---

---

---

---

---

### TELL HER YOU ARE GOING TO TAKE HER TO THE DAY OF THE ATTACK

GO SLOW  
ASK HER HOW HER DAY STARTED  
IF SHE WAS ATTACKED IN THE MORNING, START BY ASKING HER WHAT SHE DID THE NIGHT BEFORE  
WHERE WAS SHE THAT MORNING  
WHO WAS WITH HER  
WHAT DID SHE/THEY DO  
WHERE THEY ATE LUNCH  
WHAT ERRANDS THEY RAN  
WHAT MOVIE THEY SAW  
WHAT PEOPLE THEY VISITED

---

---

---

---

---

---

---

BRING IN THE PEOPLE THE VICTIM SAW  
BEFORE THE ATTACK TO TESTIFY  
ABOUT HER Demeanor

---

---

---

---

---

---

---

### The day of the attack....

- At about (time) where were you
  - What were your plans that evening
  - Did something happen that changed you
- They will give a short answer such as only:  
"I was raped"

---

---

---

---

---

---

---

YOUR JOB IS TO GET EVERY  
DETAIL OF THE CRIME

---

---

---

---

---

---

---

REMEMBER - YOU PROVE YOUR  
CASE IN THE DETAILS THAT SATISFY  
THE 5  
GOALS  
OF  
DIRECT  
EXAMINATION

---

---

---

---

---

---

---

### GOAL #1

TAKING THE JURORS TO THE SCENE

WHERE DID THIS HAPPEN?

*DETAILS: WHAT SHE SAW, HEARD,  
SMELLED, FELT*

---

---

---

---

---

---

---

EXAMPLE OF A RAPE IN A CAR

WHAT KIND OF CAR WAS IT?

WHO OWNED THE CAR?

WHAT COLOR WAS THE CAR?

*(ADMIT PICTURES OF CAR'S EXTERIOR)*

---

---

---

---

---

---

---

### Example of rape in a car....

- ▷ DID THE CAR HAVE BUCKET OR BENCH SEATS?
- ▷ CLOTH OR LEATHER?
- ▷ ANY TEARS?
- ▷ ANY STAINS?
- ▷ ANYTHING ON THE SEAT? (BLANKET, CAR SEAT)

---

---

---

---

---

---

---

---

### Example of rape in a car....

- ▷ WHERE WAS THE CAR PARKED WHEN THE DEFENDANT FIRST BEGAN TOUCHING YOU?
- ▷ LIGHTING - ANY OUTDOOR OR OVERHEAD LIGHTS?  
(PICTURES OF PARKING LOT / GARAGE AND LIGHT POLES/BULBS)

---

---

---

---

---

---

---

---

### Example of rape in a car....

- ▷ WHAT DID YOU HEAR WHEN DEFENDANT WAS HAVING UNCONSENTUAL INTERCOURSE WITH YOU?  
TRAIN WHISTLE (PICTURE OF TRAIN TRACKS)
- RADIO? -WHAT SONGS, ARTIST, WORDS (MAY BE ABLE TO USE IN CLOSING)
- MOVING WATER? (PICTURE OF NEARBY STREAM)

---

---

---

---

---

---

---

---



### In every rape case....

- WHAT DID DEFENDANT SAY TO YOU AS HE WAS FORCING INTERCOURSE?
- EXAMPLE: "YOU'LL GIVE ME WHAT I WANT"
- HOW DID HE SAY IT?  
FORCEFULLY  
REQUEST DEFENDANT STAND AND SAY EXACT SENTENCE TO JURY

---

---

---

---

---

---

---

---

*State v. Lopez, 157 Ariz. 23, 754 P.2d 352 (1988)*

- Display of Defendant's tatoos to the jury, during trial, at the State's request was upheld.

---

---

---

---

---

---

---

---

### Getting the details....

- WAS THERE SOMETHING ABOUT WHERE THIS TOOK PLACE THAT YOU REMEMBER?
- Smelled lilac bushes (picture of lilac bush)
- Defendant's aftershave
- Barking dogs (pictures of neighborhood dogs)

---

---

---

---

---

---

---

---

### Example of rape in a car....

#### • WAS THE CAR RUNNING OR TURNED OFF?

National Weather Service report on weather conditions that day

#### • WHAT OBJECTS DID YOU SEE IN THE CAR? TRASH? (pictures of pieces of trash)

---

---

---

---

---

---

---

---

### Example of rape in a car....

#### • WAS THERE ANYTHING DISTINCTIVE ABOUT THE DEFENDANT'S CAR THAT YOU REMEMBER?

1 headlight out  
Knobs on the dash broken  
Door handle torn  
Air freshener from rearview mirror  
Bad shocks  
Rusty side panels  
Squeaky brakes  
Mustard stain on front floor board

---

---

---

---

---

---

---

---

### GOAL # 2

#### • ALLOW THE JURORS TO "EXPERIENCE THE CRIME"

WHAT DID YOU FEEL WHEN THE DEFENDANT'S PENIS PENETRATED YOUR VAGINA?

• TEARING (PICTURE OF TEARS)  
• PAIN  
• SHAME  
• HUMILIATION  
• POWERLESSNESS  
• FEAR  
• VIOLATION

---

---

---

---

---

---

---

---

CONCENTRATE ON PHYSICAL FINDINGS IF YOU HAVE THEM

DID YOU RECEIVE ANY PHYSICAL INJURIES?

CUTS	}	(PICTURES)
BRUISES		
REDNESS		
TEARING – VAGINA, HAIR		
BLEED		
SPRAINED		
SWOLLEN		
		MEDICAL RECORDS

---

---

---

---

---

---

---

---

DID YOU MISS WORK OR SCHOOL BECAUSE OF INJURIES?

(WORK OR SCHOOL RECORDS OF ABSENCE)

---

---

---

---

---

---

---

---

Proving your case....

- IF SHE SAID "NO" Always ask about that
- Did you ever tell the defendant NO or STOP?
- How many times?
- Where were you when you told the defendant no or stop?
- What was he doing?
- Did he stop?
- What did he do?
- How did you say it?

(HAVE HER TELL THE JURY NO OR STOP JUST LIKE SHE TOLD THE DEFENDANT)

---

---

---

---

---

---

---

---

### Proving your case....

- IF SHE STRUGGLED, BE SURE TO GET EVIDENCE OF THIS IN -

FOUGHT, TWISTED, TURNED, KEPT MOUTH CLOSED, TRIED TO KEEP LEGS CLOSED

(PICTURES OF TORN CLOTHING)

---

---

---

---

---

---

---

---

### Proving your case....

- HOW DID YOU GET AWAY?

SHE RAN  
DEFENDANT FELL ASLEEP  
NEIGHBOR HEARD AND CALLED 911  
PASSING MOTORIST HELPED HER

---

---

---

---

---

---

---

---

### Proving your case....

- AFTER THE RAPE WHAT DID YOU DO?  
TOLD 1<sup>ST</sup> RESPONDING OFFICERS  
HOW MANY?  
WENT TO THE HOSPITAL  
TOLD HOSPITAL PERSONNEL (USE HOSPITAL RECORDS)  
PREPARED FOR A SEXUAL ASSAULT EXAM
- WHAT WAS SHE TOLD WOULD HAPPEN?

---

---

---

---

---

---

---

---

### Proving your case....

- › DID YOU UNDERGO A SEXUAL ASSAULT EXAMINATION?
- › WHAT DID THEY DO?

---

---

---

---

---

---

---

### details

DISROBE  
LAY ON COLD TABLE  
COMB PUBIC HAIR  
PULL HEAD HAIR  
SWABS OF MOUTH, VAGINA, ANUS  
VISUAL EXAM OF VAGINA, ANUS  
WHITE PAPER COLLECTED  
BLOOD DRAWN  
HER CLOTHES COLLECTED  
TREATED FOR STD  
TREATED FOR PREGNANCY

(SHOW HER THE EXHIBITS ALREADY ADMITTED)

---

---

---

---

---

---

---

### Proving your case....

- › HOW DID YOU GET HOME FROM THE HOSPITAL?
  - Friend
  - Stranger (police officer)
  - Family member

---

---

---

---

---

---

---

## YOUR GOAL IS...

TO SHOW IT IS NOT AN  
EXPERIENCE A PERSON WOULD  
WANT TO GO THROUGH

---

---

---

---

---

---

---

## Don't forget....

- If your victim began therapy after the attack:

As a result of the defendant's actions  
on (date), did you begin to see a  
counselor?

- Who?
- How often have you gone?
- How is the therapy going?

---

---

---

---

---

---

---

THIS LINE OF QUESTIONING IS  
TO LAY THE FOUNDATION FOR  
THERAPIST TO TESTIFY ABOUT  
RAPE TRAUMA SYNDROME

---

---

---

---

---

---

---



*State v. Huey, 145 Ariz. 59, 699 P.2d 1290 (1985)*

"The testimony of psychiatrist who examined victim shortly after she escaped from defendant would have been admissible to show lack of consent, even if such testimony concerned rape trauma syndrome."

### Arizona Statute: 12-2203

- Admissibility of expert opinion testimony:
- A. In a civil or criminal action, only a qualified witness may offer expert opinion testimony regarding scientific, technical or other specialized knowledge and the testimony is admissible if the court determines that all of the following apply:
  - 1. The witness is qualified to offer an opinion as an expert on the subject matter based on knowledge, skill, experience, training or education.....

### PREPARING YOUR WITNESSES FOR CROSS-EXAMINATION

- WHAT DEMEANORS HURT THE CASE
- WHAT QUESTIONS THEY CAN EXPECT TO BE ASKED
- HOW THE DEFENSE ATTORNEY GENERALLY CONDUCTS HERSELF
- HOW THE JUDGE GENERALLY RUNS THE COURT
- WHAT WEAKNESSES THERE ARE IN THE CASE
- WHAT STRENGTHS THERE ARE IN THE CASE

---

---

---

---

---

---

---

---

### Preparing your witnesses for CROSS...

- WHAT EXHIBITS YOU WILL USE WITH HER
- WHAT EXHIBITS THE DEFENSE ATTORNEY MAY USE WITH HER
- WHAT TO WEAR
- WHAT NOT TO WEAR
- NO CHEWING GUM
- NO UH HUHS RO HUH UHS

---

---

---

---

---

---

---

---

### PROBLEMS WITH UNPREPARED WITNESSES

- She said WHAT?
- Poker face contest
- Answers that are helpful to the defense
- Answers that are harmful to the state
- Attitude
- Witness likability
- You can't lay your foundation to get evidence in
- You don't know they faint when they see blood

---

---

---

---

---

---

---

---

### Problems with unprepared witnesses....

- Your victim comes across spiteful
- You learn new facts for the 1<sup>st</sup> time – good and bad (tooth)
- You learn of other witnesses for the 1<sup>st</sup> time
  - They are not listed in the report
  - Family/friends who could have helped
  - Domino effect – once unprepared leads to all unprepared n

---

---

---

---

---

---

---

---

### HOW TO HANDLE WITNESS DEMEANOR PROBLEMS

#### ANGER

ARE YOU ANGRY? WHY?

#### FORGETFUL

PRIOR STATEMENTS

#### FEARFUL

STAND CLOSER – EXTRA SECURITY

---

---

---

---

---

---

---

---

### Handling demeanor problems....

- CRYING
  - MAKE SURE JURORS CAN UNDERSTAND HER
- TOO EAGER
  - WHOA!
- CONFIRM EVERY DETAIL WITH INDEPENDENT PROOF
  - PHYSICAL EVIDENCE
  - OTHER WITNESSES
  - FORENSICS
  - CHARTS

---

---

---

---

---

---

---

---

### WHY YOU SHOULD PREPARE A TRIAL NOTEBOOK...

- › Organizes you
- › Let's the jury see you're organized
- › Looks professional
- › Calming when under fire
- › Helps you remember things

---

---

---

---

---

---

---

---

### TRIAL NOTEBOOKS SHOULD INCLUDE:

- › A "TO DO" list
- › Voir Dire (not Vuwa Deer)
- › Motions/Trial Briefs
- › Complaint
- › Opening
- › Witnesses in alphabetical order
- › Defendant
- › Defense witnesses
- › Closing
- › Jury Instructions
- › Exhibits

---

---

---

---

---

---

---

---

### ORDER OF WITNESSES:

- › Start and end strong
- › Uniforms/badges
- › Don't forget problems right after lunch
- › How's the temperature?
- › Expert's schedules
- › Chronological
- › What order of witnesses is needed to lay the necessary foundation for your exhibits?

---

---

---

---

---

---

---

---

### CONSIDER THE TYPE OF WITNESS IN PREPARING YOUR LINE-UP

- WHO ADVANCES YOUR CASE THEORY
- SUMMARIZING THE EVENTS
- DESCRIBE THE CRIME SCENE

---

---

---

---

---

---

---

### TYPICAL WITNESS LINE-UP FOR MISDEMEANOR AND LOW LEVEL FELONY CASES

- 1<sup>ST</sup> RESPONDING OFFICER  
DESCRIBE THE CRIME SCENE
- VICTIM
- OFFICER THAT SPOKE WITH THE VICTIM
- EYEWITNESSES
- OFFICERS THAT TOOK EYEWITNESS STATEMENTS

---

---

---

---

---

---

---

### Lunch...

- 911 OPERATOR
- OFFICER THAT TOOK THE DEFENDANT'S  
CONFESSION
- OFFICER THAT CAN DESCRIBE VICTIM'S  
INJURIES AND/OR DEMEANOR

---

---

---

---

---

---

---

### HANDLING EVIDENCE WITH WITNESSES

- GET THE ENTIRE VERSION OUT 1<sup>ST</sup>
- GO BACK THROUGH... "YOU TOLD US..."
- USE YOUR EXHIBITS
- DON'T HAVE TO OPEN ALL THE EVIDENCE BAGS WITH THE FIRST WITNESS

---

---

---

---

---

---

---

### SPECIAL CONSIDERATIONS IN USING EVIDENCE WITH WITNESSES

- HAVE TECHNOLOGY READY
  - ELMO
  - COMPUTER
  - SCREEN

---

---

---

---

---

---

---

### Handling evidence with witnesses....

- GLOVES
- EFFECT ON WITNESS IN SEEING/HEARING THE EXHIBIT

---

---

---

---

---

---

---



### WITNESS' ROLE IN THE CASE THEORY

- WHAT IS YOUR CASE THEORY AND WHO CAN PROVE IT
- THE CRIME WAS COMMITTED BECAUSE OF JEALOUSY, REVENGE, CONTROL, RANDOM OR IT IS MORE OF THE SAME

---

---

---

---

---

---

---

### TIPS FOR EFFECTIVELY COMMUNICATING THE WITNESS' ROLE TO THE JURY

- THERE'LL BE SOME GIVE AWAYS

UNIFORMS

POLICE

FIRE

EMS

---

---

---

---

---

---

---

### EVEN THE UNIFORMS NEED EXPLAINING...

- "WERE YOU THE FIRST REPORTING OFFICER ON THE SCENE?"
- "DID YOU TALK TO THE DEFENDANT?"
- "WERE YOU ABLE TO COLLECT EVIDENCE?"

---

---

---

---

---

---

---

### USE LABELS THAT ANNOUNCE THE WITNESS' ROLE AND VANTAGE POINT

- "ARE YOU AN EYEWITNESS?"
- "ARE YOU THE PERSON WHO CALLED 911?"
- "ARE YOU THE VICTIM'S NEIGHBOR?"

---

---

---

---

---

---

---

### TYPES OF PROBLEM WITNESSES:

- DIFFICULT OR UNLIKABLE
- CHILDREN
- BATTERED: RECANTING OR HOSTILE
- OVERLY COOPERATIVE
- FEARFUL
- MENTALLY CHALLENGED
- PROSTITUTE
- HOMELESS
- PRIOR CRIMINAL RECORD
- UNSYMPATHETIC
- DRUG/ALCOHOL ABUSER
- GANG MEMBERS
- DEFENDANT'S FAMILY MEMBERS/FRIENDS

---

---

---

---

---

---

---

### WHAT DO THESE ALL HAVE IN COMMON?

- POTENTIALLY UNBELIEVABLE
- "SO WHAT"  
AKA "WHOOPTDO"

---

---

---

---

---

---

---

HOW DO WE FIX IT?

PREPARATION

PREPARATION

PREPARATION

---

---

---

---

---

---

---

JACQIE SPRADLING  
CHIEF DEPUTY DISTRICT ATTORNEY  
SHAWNEE COUNTY DISTRICT ATTORNEY  
200 SE 7<sup>TH</sup> STREET SUITE 214  
TOPEKA, KANSAS 66603  
785-233-8200 EXT 4330  
(FAX) 785-291-4909

---

---

---

---

---

---

---